

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION

UNITED STATES OF AMERICA, ) No. \_\_\_\_\_  
                                ) \_\_\_\_\_  
Plaintiff,                 ) COUNT ONE  
                                ) 18 U.S.C. § 1546(a)  
v.                             ) (False Statement in immigration matter)  
                                ) NMT: 15 Years Imprisonment  
JAGADISH D. PATEL,         ) NMT: 3 Years Supervised Release  
[DOB: 08/07/1957]             ) NMT: \$250,000 Fine  
                                ) Class C Felony  
Defendant .                 ) \_\_\_\_\_  
                                ) COUNT TWO  
                                ) 18 U.S.C. § 1001  
                                ) (False Statement)  
                                ) NMT: 5 Years imprisonment  
                                ) NMT: 3 Years Supervised Release  
                                ) NMT: \$250,000 Fine  
                                ) Class D Felony  
                                ) \_\_\_\_\_  
                                ) \$100 MSA (each count)

I N D I C T M E N T

THE GRAND JURY CHARGES:

I. BACKGROUND

At all times material to this Indictment:

1. Jagadish D. Patel (hereinafter Patel), defendant herein, was a citizen and national of India who illegally entered the United States from Mexico on or about February 1, 1995.
2. Thereafter, defendant Patel married Dinisha Patel, a permanent resident of the United States, on October 2, 1996 in Clayton, Missouri. Consequently, Dinisha Patel became a naturalized United States citizen on August 16, 2002, in St. Louis, Missouri.

3. Subsequently, in Kansas City, Missouri, defendant Patel applied for permanent resident status in the United States on September 3, 2002, based upon the above marriage as described in paragraph two (2) of this indictment.

4. On or about November 12, 2002, in St. Louis, Missouri, defendant Patel acted as an interpreter for an illegal Indian national associate who was subsequently arrested.

5. On or about January 10, 2003, four (4) illegal Indian nationals were arrested at defendant Patel's Super 8 Motel in Okawville, Illinois following a conversation with defendant Patel.

6. On or about September 10, 2003, two (2) Indian nationals were arrested at defendant Patel's Super 8 Motel in Okawville, Illinois without passports and were later released.

7. On or about April 8, 2004, two (2) illegal Indian nationals were arrested at a liquor store owned by defendant Patel in Flora, Illinois.

8. On or about March 3, 2003, defendant Patel was granted permanent resident status in Kansas City, Missouri based upon the above marriage as described in paragraph two (2) of this indictment.

9. On or about December 7, 2005, defendant Patel, as part of an Application for Naturalization (INS Form N-400), submitted in Kansas City, Missouri to the United States Bureau of Citizenship and Immigration Enforcement (CIS), stated under oath under penalty of perjury that he resided at 222 Peculiar Dr., Apt. 306, Belton, Missouri 64012 from December 2000 to the time of the above application.

10. On or about August 1, 2006, defendant Patel, as part of the naturalization interview with CIS, stated under oath under penalty of perjury in Kansas City, Missouri that he resided at 222

Peculiar Dr., Apt. 306, Belton, Missouri 64012 from December 2000 to the date of this interview.

11. Between December 2000 and August 1, 2006, defendant Patel resided at the Super 8 Motel at 812 North Hen House Rd., Okawville, Illinois 62271.

## II. THE SCHEME AND ARTIFICE TO DECEIVE

12. Beginning on or about December 7, 2005, Jagadish D. Patel, defendant herein, devised a scheme and artifice to deceive the United States and the United States Bureau of Citizenship and Immigration Services (CIS) by means of materially false statements as described in paragraphs nine (9) and ten (10) of this indictment.

13. It was part of the scheme and artifice to deceive that defendant Patel misrepresented to CIS on December 7, 2005 and August 1, 2006, the location of his residence, in order to hasten the processing and approval of his application for naturalization.

14. It was further part of the scheme and artifice to defraud that defendant Patel submitted his naturalization application in the Western District of Missouri for the purpose of avoiding detection by immigration officials, of the activities described in paragraphs four (4) though seven (7) of this indictment, which activities occurred outside the Western District of Missouri.

## III. VIOLATIONS

### COUNT ONE

On or about December 7, 2005, Jagadish D. Patel, defendant herein, in the Western District of Missouri, did knowingly make under oath and subscribed as true under penalty of perjury under 28 U.S.C. § 1746, a false statement with respect to a material fact in an application and document required by the immigration laws and regulations prescribed thereunder, to wit,

INS Form N-400 Application for Naturalization, that is, that he resided at 222 Peculiar Dr., Apt. 306, Belton, Missouri 64012, between December 2000 and December 7, 2005, which statement the defendant then and there knew was false, in that defendant resided at 812 North Hen House Rd., Okawville, Illinois 62271 during this period.

All in violation of Title 18, United States Code, Section 1546(a).

COUNT TWO

On or about August 1, 2006, in the Western District of Missouri, in a matter within the jurisdiction of the United States Citizenship and Immigration Services (CIS), an agency of the United States, Jagadish D. Patel, defendant herein, knowingly and willfully made a false, fictitious and fraudulent material statement and representation, in that the defendant stated that he resided at 222 Peculiar Dr., Apt. 306, Belton, Missouri 64012 between December 2000 and August 1, 2006 when in truth and in fact defendant resided at 812 North Hen House Rd., Okawville, Illinois 62271 during this period.

All in violation of Title 18, United States Code, Section 1001.

A TRUE BILL.

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7/14/09

DATE

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/s/ Georgia A. Young

FOREPERSON OF THE GRAND JURY

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/s/ William L. Meiners  
William L. Meiners, #28263  
Assistant United States Attorney